

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of South Carolina



Division

RCVD - USDC COLA SC
JAN 17 '25 PM4:40

ROBERT ANDRE REYNOLDS

Case No. 3:25-cv-00344-SAL-SVH

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

LOUIS DEJOY

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ROBERT ANDRE REYNOLDS
Street Address	127 Windfall Rd
City and County	Blythewood
State and Zip Code	South Carolina 29016
Telephone Number	803.729.8375
E-mail Address	cccoperationsofficer@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	<u>Louis Dejoy</u>
Job or Title <i>(if known)</i>	<u>Louis DeJoy, Postmaster General, U.S. Postal Service, Agency.</u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 2

Name	<u>Dormes Black</u>
Job or Title <i>(if known)</i>	<u>Supervisor of Distribution Operations</u>
Street Address	<u>Last Known: 2001 Dixiana Rd</u>
City and County	<u>Cayce</u>
State and Zip Code	<u>South Carolina 29172</u>
Telephone Number	<u>803.926.6100</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 3

Name	<u>Donte Bessent</u>
Job or Title <i>(if known)</i>	<u>AMDO</u>
Street Address	<u>Last Known: 2001 Dixana Rd</u>
City and County	<u>Cayce</u>
State and Zip Code	<u>South Carolina 29172</u>
Telephone Number	<u>802.926.6100</u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 4

Name	<u>Mya Simpson</u>
Job or Title <i>(if known)</i>	<u>Labor Relations Specialist</u>
Street Address	<u>P.O. Box 929401</u>
City and County	<u>Columbia</u>
State and Zip Code	<u>South Carolina 29292-9401</u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

See Attached

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Robert Andre Reynolds, is a citizen of the
State of *(name)* South Crolina.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Louis Dejoy, is a citizen of
the State of *(name)* United States. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
See Attached

\$20,000,000 (including economic, non-economic, punitive, and statutory damages)

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.
See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attached

Pro Se 1 Answers:

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Federal court jurisdiction is grounded in the authority granted by the U.S. Constitution and federal statutes. The primary bases for federal court jurisdiction are:

1. Federal Question Jurisdiction (28 U.S.C. § 1331)

- Federal courts have jurisdiction over cases involving a question of federal law. This includes:
 - Claims arising under the U.S. Constitution, federal statutes, or treaties.
 - Examples relevant to your case could include claims under the **Family and Medical Leave Act (FMLA)** or the **Americans with Disabilities Act (ADA)**.

2. Diversity Jurisdiction (28 U.S.C. § 1332)

- Federal courts can hear cases where:
 - The parties are citizens of different states, and
 - The amount in controversy exceeds \$75,000 (exclusive of interest and costs).
- Diversity jurisdiction may not apply if all parties are from the same state.

3. Supplemental Jurisdiction (28 U.S.C. § 1367)

- If a federal court has jurisdiction over a primary claim, it can also hear related state law claims that arise from the same set of facts or controversy. For example:
 - If you assert an FMLA violation (federal claim) and a state-law wrongful termination claim, the court might exercise supplemental jurisdiction over the state-law claim.

4. Jurisdiction Over Claims Against Federal Officials or Agencies

- Cases involving federal agencies, officials, or employees acting in their official capacity may also fall under federal jurisdiction.

5. Exclusive Jurisdiction

- Some federal laws grant exclusive jurisdiction to federal courts. For example:

- Certain claims under federal employment laws, such as the **FMLA**, can only be brought in federal court under specific circumstances.

Establishing Jurisdiction in Your Filing

In your case, the likely basis for federal court jurisdiction is **Federal Question Jurisdiction**, as claims under the **FMLA** and **ADA** arise from federal statutes. On the forms, you will need to:

1. Cite the relevant federal laws (e.g., FMLA, 29 U.S.C. § 2601 et seq.; ADA, 42 U.S.C. § 12101 et seq.).
2. Clearly describe how your claims involve violations of these laws.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Statement of the Claim

III. Statement of Claim

On **September 12, 2022**, Plaintiff was called into a meeting by **Supervisor Dormes Black** and **Acting Manager of Distribution Operations (A/MDO) Donte Bessent** in the General Clerks Conference Room. During this meeting, Plaintiff was informed of their termination based on alleged **unsatisfactory attendance** and a **violation of the Last Chance Agreement** signed under duress.

Despite providing evidence of an active Family and Medical Leave Act (FMLA) case related to Plaintiff's lifelong condition of diabetes with neuropathy, including voicemails from **HRSSC representatives**, Defendants ignored this documentation. Plaintiff explicitly informed Defendants that the HRSSC confirmed an open and active FMLA case and that they could verify this by contacting the HRSSC via email. However, both **Supervisor Dormes Black** and **Donte Bessent** willfully chose not to contact the HRSSC, despite being advised of this option, demonstrating negligence and intentional disregard for Plaintiff's rights under FMLA.

Additionally:

1. Plaintiff was subjected to a hostile work environment through unwarranted investigative interviews and write-ups.
2. Plaintiff previously filed an Equal Employment Opportunity (EEO) complaint against **Supervisor Dormes Black** after being falsely accused of delaying mail, creating a pattern of retaliation.
3. The termination caused Plaintiff to lose income, a home purchase opportunity, a 2013 Audi A4 vehicle, and led to significant emotional trauma.

Defendants acted with intent to humiliate and harm Plaintiff in violation of federal laws protecting against retaliation and disability discrimination.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

IV. Relief Sought

To justify the **\$20,000,000** relief in your case, you'll need to emphasize the significant economic, non-economic, and punitive damages caused by the Defendants' actions. Below is a detailed explanation and justification of how this figure can be supported:

1. Economic Damages

Economic damages represent your financial losses due to the Defendants' actions. Here's how you can calculate and justify these losses:

A. Loss of Home Purchase Opportunity

- **Impact:** Your termination and financial instability prevented you from purchasing a home. Provide the following:
 - **Home value:** Estimate the purchase price (e.g., \$300,000).
 - **Lost equity and opportunity costs:** Homes often appreciate, and owning a home provides tax benefits. Estimate appreciation and tax benefits (e.g., \$100,000 over 5 years).
 - **Total:** \$400,000.

B. Loss of 2013 Audi A4

- **Impact:** Losing your vehicle due to financial difficulties caused by your termination is a direct consequence of the Defendants' actions.
 - **Estimated value:** Approx. \$15,000.
 - **Associated costs:** Increased transportation expenses (e.g., rideshare costs or inability to commute).
 - **Total:** \$20,000.

C. Credit Score Impact

- **Impact:** A drop in your credit score affects your ability to secure loans or increases the cost of borrowing.
 - Estimate higher interest payments on future loans and credit cards (e.g., \$50,000 over time).
 - **Total:** \$50,000.

D. Lost Wages and Benefits

- **Impact:** Unemployment during the grievance process caused loss of income and benefits.
 - Approximate lost wages over 6 months: \$25,000.
 - **Total:** \$25,000.

E. Future Earnings Loss

- **Impact:** Damage to your reputation and career prospects reduces future earnings.
 - Estimate: \$500,000.
 - **Total:** \$500,000.

Total Economic Damages: \$995,000.

2. Non-Economic Damages

Non-economic damages address emotional distress, pain, and suffering.

A. Emotional Distress

- **Impact:** The Defendants' conduct caused extreme emotional trauma, affecting your ability to function and trust future employers.

- Emotional distress in employment cases can justify significant damages. Provide:
 - **Testimony:** Describe your mental state during and after the termination (anxiety, depression, etc.).
 - **Therapy/Medical Records:** Evidence of counseling or treatment.
- **Justification:** Employment retaliation cases with clear distress have resulted in damages up to \$5,000,000.

B. Pain and Suffering

- **Impact:** Your lifelong condition of diabetes and neuropathy worsened due to the stress of termination and retaliation.
 - Provide medical documentation showing exacerbation of your condition due to stress.
 - **Justification:** Estimated damages: \$5,000,000.

C. Loss of Enjoyment of Life

- **Impact:** The actions of the Defendants have permanently altered your career trajectory and personal goals.
 - Demonstrate how you lost trust in employers, hindering career progress.
 - **Justification:** Estimated damages: \$2,500,000.

Total Non-Economic Damages: \$12,500,000.

3. Punitive Damages

Punitive damages serve to punish the Defendants for intentional and egregious conduct.

A. Intentional Disregard for Federal Rights

- Defendants ignored clear evidence of your active FMLA case and chose not to investigate, showing willful negligence.
- Punitive damages under ADA are capped at **\$300,000**, but additional punitive damages under constitutional claims or other laws may justify exceeding this cap.
- **Total:** \$1,000,000 (reasonable given the scale and intent).

4. Statutory and Liquidated Damages (FMLA)

The FMLA allows for **liquidated damages** equal to lost wages unless the employer can prove good faith.

A. FMLA Liquidated Damages

- **Lost wages:** \$25,000.
- **Liquidated damages:** Equal to lost wages: \$25,000.
- **Total:** \$50,000.

Grand Total of Damages

Adding the categories together:

- **Economic Damages:** \$995,000.
- **Non-Economic Damages:** \$12,500,000.
- **Punitive Damages:** \$1,000,000.
- **Statutory Damages:** \$50,000.
- **Total:** \$14,545,000.

Bridge to \$20,000,000

To request the full \$20,000,000, you can argue:

1. **Severity of Emotional Harm:** Emphasize long-term damage, including loss of trust in employers and difficulty securing future jobs.
2. **Wider Public Policy Impact:** Highlight the need for deterrence in large organizations like USPS, where systemic issues must be addressed to prevent future harm to other employees.
3. **Potential Additional Claims:** Seek damages for related claims under constitutional violations or additional federal statutes.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1.17.2025

Signature of Plaintiff

Printed Name of Plaintiff



Robert Reynolds

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address